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Acting Assistant Attorney General

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Of Counsel:  
DANIEL BOGDEN  
United States Attorney  
Counsel for the United States

IN THE UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,	)	
	)	Case No.: 2:15-cv-02424-APG-GWF
Plaintiff,	)	
	)	
v.	)	
	)	
CONSTANTIN OCHESCU,	)	
LILIANA COSMA,	)	
DITECH FINANCIAL LLC, and	)	
REPUBLIC SERVICES, INC.,	)	
	)	
Defendants.	)	

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**UNITED STATES' MOTION REGARDING SERVICE BY PUBLICATION**

This is a civil action that seeks to reduce federal income tax assessments to judgment and to foreclose on certain real property to help satisfy the judgment. On March 14, 2016, the Court granted the United States' request for permission to serve defendants Constantin Ochescu and Liliana Cosma by publication, in accordance with Nevada Rule of Civil Procedure 4(e). (*See* Dkt. 13) That rule permits service by "publication of summons". The Court's Order directed the United States to publish a copy of the Summons and the Complaint at least once a week for four weeks in the Nevada Legal News.

After consultation with the Nevada Legal News, the United States has learned that it would be costly to publish the entire Complaint. Counsel understands that it is common practice to publish a copy of the Summons and a brief description of the Complaint, as described in Nevada Rule of Civil Procedure 4(b).

#### **REQUEST FOR RELIEF**

The United States respectfully requests that the Court permit service by publishing the Summons and the notice attached here as Exhibit A (or a document substantially similar thereto), rather than the complete Complaint.

DATED this 18th day of March, 2016

Respectfully submitted,

CAROLINE D. CIRAULO  
Acting Assistant Attorney General


/s/ E. Carmen Ramirez

E. CARMEN RAMIREZ  
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*Counsel for the United States*

IT IS SO ORDERED:

  
\_\_\_\_\_  
GEORGE FOLEY, JR.  
United States Magistrate Judge

DATED: March 21, 2016

**CERTIFICATE OF SERVICE**

IT IS HEREBY CERTIFIED that service of the foregoing is made this 18th day of March, 2016 on the following parties, by the following means:

By U.S. Mail:

Constantin Ochescu  
8064 Cetus Circle  
Las Vegas, NV 89128  
*(with copy of Complaint and Summons)*

Liliana Cosma  
8064 Cetus Circle  
Las Vegas, NV 89128  
*(with copy of Complaint and Summons)*

Ditech Financial, LLC  
c/o The Corporation Trust Company of NV  
701 S. Carson Street Suite 200  
Carson City, NV 89701

By ECF:

Republic Silver State Disposal, Inc. d/b/a Republic Services, Inc.  
c/o Donald H. Williams  
Williams & Associates  
612 South Tenth St.  
Las Vegas, NV 89101

/s/ E. Carmen Ramirez  
E. CARMEN RAMIREZ  
Trial Attorney, Tax Division  
U.S. Department of Justice

# **EXHIBIT A**

IN THE UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	Case No.: 2:15-cv-02424-APG-GWF
	)	
v.	)	
	)	
CONSTANTIN OCHESCU,	)	
LILIANA COSMA,	)	
DITECH FINANCIAL LLC, and	)	
REPUBLIC SERVICES, INC.,	)	
	)	
Defendants.	)	

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**NOTICE REGARDING  
COMPLAINT TO REDUCE FEDERAL INCOME TAX ASSESSMENTS TO  
JUDGMENT AND TO FORECLOSE FEDERAL TAX LIENS**

The United States of America hereby notifies defendants Constantin Ochescu and Liliana Cosma that it has filed suit against them in the United States District Court for the District of Nevada. This action is brought to obtain a judgment against Mr. Ochescu, and to foreclose on real property located at 8064 Cetus Circle, Las Vegas, NV 89128, which the United States alleges that Ms. Cosma holds as Mr. Ochescu's nominee. The property is a 1232 sq. ft. single family home on a 0.10 acre lot, and is more particularly described as follows:

LOT ELEVEN (11) IN BLOCK ONE (1) OF CIMARRON  
RIDGE UNIT 1, AS SHOWN BY MAP THEREOF ON FILE IN  
BOOK 57 OF PLATS, PAGE 65 IN THE OFFICE OF THE  
COUNTY RECORDER OF CLARK COUNTY, NEVADA

For more information, contact the following counsel:

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